



21st Floor  
1251 Avenue of the Americas  
New York, NY 10020-1104

**Elizabeth A. McNamara**  
212.489.8230 tel  
212.489.340 fax

[lizmcnamara@dwt.com](mailto:lizmcnamara@dwt.com)

February 2, 2024

**VIA ECF**

Hon. Sarah Netburn  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: ***Devin G. Nunes v. NBCUniversal Media, LLC, 1:22-cv-01633-PKC-SN***

Dear Magistrate Judge Netburn:


Plaintiff Devin G. Nunes (“Plaintiff”) and Defendant NBCUniversal Media, LLC (“NBCU”) respectfully submit this joint letter in accordance with the Court’s January 29, 2024 Order (Dkt. 89). On February 1, 2024, the Parties held a meet and confer to address NBCU’s concerns regarding preservation and production of documents in this litigation. The Parties remain at impasse and NBCU believes that these issues require the Court’s intervention. Accordingly, the Parties write to propose a briefing schedule.

The Parties propose that NBCU will file its letter brief by February 13, 2024 and Plaintiff will file its response by February 27, 2024.

The Parties thank the Court for its time and attention to this matter.

Hon. Sarah Netburn  
February 2, 2024  
Page 2

Respectfully Submitted,



Elizabeth A. McNamara  
Jeremy A. Chase  
Alexandra M. Settelmayer  
DAVIS WRIGHT TREMAINE LLP  
1251 Avenue of the Americas, 21st Floor  
New York, NY 10020  
Tel: (212) 489-8230  
Email: lizmcnamara@dwt.com  
jeremychase@dwt.com  
alexandrasettelmayer@dwt.com

*Attorneys for Defendant  
NBCUniversal Media, LLC*

/s/ Jason Greaves

Jason Greaves  
Shawn Flynn  
BINNALL LAW GROUP  
717 King Street, Suite 200  
Alexandria, VA 22314  
Tel: (703) 888-1943  
Email: jason@binnall.com  
shawn@binnall.com

*Attorneys for Plaintiff Devin G. Nunes*